

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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HC2, INC.,

: Civil Action No.: 1:20-cv-3178 (LJL)

Plaintiff,

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ANDREW DELANEY,

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Defendant.

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## **NOTICE OF MOTION FOR A PRELIMINARY INJUNCTION**

**PLEASE TAKE NOTICE** that pursuant to the Court's Order, dated May 7, 2020 (ECF No. 25), upon the annexed Declaration of Robert R. Rossi, dated May 22, 2020, with the exhibits annexed thereto, and upon all papers and proceedings had herein; and upon the accompanying Memorandum of Law, dated May 22, 2020, Plaintiff HC2, Inc. ("HC2") will move this Court via telephonic oral conference, on May 26, 2020 at 1:00 p.m., for an order, pursuant to Rule 65 of the Federal Rules of Civil Procedure, enjoining Defendant Andrew Delaney, from using or disclosing confidential and privileged information that he obtained during his employment with HC2, and continuing all injunctive relief set forth in this Court's Temporary Restraining Order, dated April 29, 2020 (ECF. No. 14).

Dated: New York, New York  
May 22, 2020

Respectfully submitted,  
KASOWITZ BENSON TORRES LLP

By: /s/ Ronald R. Rossi

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